



Counsel for Plaintiffs agreed to this request, a motion was filed [Doc. 5], and the Court granted the motion extending the deadline to May 19, 2025 [Doc. 6].

4. Counsel for all parties conferred again on May 8, 2025, and again sought an extension to continue their efforts to resolve or narrow the issues. Defendants filed an agreed motion for extension [Doc. 7], and the Court granted the motion, extending the deadline to June 16, 2025 [Doc. 9].

5. Since that date, the parties have continued making meaningful efforts to confer in accordance with the Court's pre-motion requirements, including two substantive conferences held over Zoom and other communications.

5. Accordingly, the parties have agreed to further extend until July 30, 2025 the Defendants' deadline to answer or otherwise respond to the Original Petition, as well as a commensurate extension of all pending court deadlines.

6. This is the parties' third request for an agreed extension of time, and is sought to allow the parties to continue their substantive efforts to resolve or narrow their disputes. Plaintiffs may also amend their Original Petition. This request is not being made for the purpose of delay, nor will any party be prejudiced.

**WHEREFORE**, Plaintiffs, Natalie Henshilwood, Shawn Jones, and Prime Title Agency, Inc., respectfully request that the Court grant this Motion and enter an order allowing Defendants until Wednesday, July 30, 2025, to answer or otherwise plead in response to Plaintiffs' Original Petition, and to extend all pending court deadlines by an equal duration.

Dated: June 10, 2025

Respectfully submitted,

**HENDERSHOT COWART P.C.**

By: /s/ Philip D. Racusin

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***ATTORNEYS FOR PLAINTIFFS***

***NATALIE HENSHILWOOD, SHAWN JONES,***

***AND PRIME TITLE AGENCY***

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiffs conferred with counsel for Defendants on June 6, 2025, and June 10, 2025, and Defendants have agreed to the relief sought in this Motion.

/s/ Philip Racusin

Philip Racusin

**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2025 a true and correct copy of the foregoing was served upon all counsel of record via the Court's ECF system.

/s/ Philip Racusin

Philip Racusin